

US DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

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DAVID ELLIOT WERKING  
An Indiana Resident, Plaintiff

v.

Case No. 1:19-cv-276  
Hon. Paul L. Maloney

BETH EILEEN WERKING, AND  
PAUL MICHAEL WERKING,  
Michigan Residents, Defendants

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**MOTION FOR AN EXTENSION OF TIME FOR DISCOVERY**

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NOW COMES the Defendants, Beth and Paul Werking, by and through undersigned counsel, pursuant to Rules 6(b) and 15(a)(3) of the Federal Rules of Civil Procedure, and move this Court for an order to extend time to complete the limited discovery into the matter of damages granted by the Opinion and Order dated November 10, 2020 (ECF No. 45) in the above-titled action. In support hereof, Defendants show the following:

1. Defendants sent their First Interrogatories to Plaintiff and First Request for Production on December 14, 2020.

2. The time granted for completing discovery granted by the Opinion and Order dated November 10, 2020 (ECF No. 45) has not yet expired.
3. This motion is not being made for the purpose of delay, but is being made based upon current assignments and the need for time to complete discovery, including conducting depositions.
4. Counsel for Plaintiff does not oppose this motion.

THEREFORE, Defendants respectfully request the Court for an order extending time to complete limited discovery into the issue of damages until March 16, 2021 and written submissions on the issue of damages be due no later than April 15, 2021.

This the 7th of January, 2021.

Respectfully submitted,

VANDEBROEK LAW PLLC

/s/ Anne M. VanderBroek

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